UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

TCF INVENTORY FINANCE, INC.)
Plaintiff,)) No. 1:19-cv-199
v.)
JERRY D. MATHIS,)
LINDA D. MATHIS,)
and)
JEFFREY DON MATHIS,)
)
Defendants.)

AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff TCF Inventory Finance, Inc. ("TCFIF") moves this Court for entry of a consent judgment in this case. In support thereof, TCFIF states as follows:

- 1. TCFIF reached an agreement with Defendants Jerry D. Mathis, Linda D. Mathis and Jeffrey Don Mathis for entry of a consent judgment.
- 2. The Court directed TCFIF to submit an agreed motion for entry of the consent judgment requesting that the case be reopened for the purpose of entering the consent judgment.
 - 3. A copy of the Consent Judgment is attached hereto as **Exhibit A**.
- 4. Counsel for Defendants Jerry D. Mathis, Linda D. Mathis and Jeffrey Don Mathis have indicated their consent to the relief requested herein.

WHEREFORE, Plaintiff TCF Inventory Finance, Inc. respectfully requests that this Court reopen the case, enter the Consent Judgment in the form attached hereto as **Exhibit A**, and grant such other relief as is just and appropriate under the circumstances.

Respectfully submitted,

TCF INVENTORY FINANCE, INC.

By; <u>/s/ Holly Campbell</u>
One of its Attorneys

William R. Bay (6181670) wbay@thompsoncoburn.com Brian W. Hockett (6281854) bhockett@thompsoncoburn.com THOMPSON COBURN LLP One US Bank Plaza St. Louis, MO 63101 (314) 552-6000 Fax: (314) 552-7000

Holly H. Campbell (6320395) hcampbell@thompsoncoburn.com THOMPSON COBURN LLP 55 East Monroe Street 37th Floor Chicago, IL 60603 (312) 346-7500 Fax: (312) 580-2201

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned herby certifies that a true and correct copy of the foregoing has been filed on May 23, 2019, through the Court's electronic filing system, by counsel for Plaintiff, and will be served on the following by the designated methods:

VIA CM/ECF George U. Oparanozie Options Law Group, P.C. 123 W. Madison Street, Suite 1400 Chicago, Illinois 60602 E-mails: optionslawgroup@yahoo.com go@optionslawgroup.com

VIA REGULAR MAIL
Gail L. Peek
J. David Dickson
BEARD KULTGEN BROPHY
BOSTWICK & DICKSON, PLLC
220 South Fourth Street Waco, Texas 76701

/s/ Holly Campbell	